

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION**

|                      |   |                              |
|----------------------|---|------------------------------|
| <b>IN RE:</b>        | ) |                              |
| <b>MELVIN TORRES</b> | ) | <b>CASE NO. 20-10747-PMM</b> |
|                      | ) | <b>CHAPTER 13</b>            |
| <b>DEBTOR</b>        | ) |                              |
|                      | ) |                              |

**NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND  
REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING  
PROPERTY DESCRIBED AS 63 W MADISON STREET, MOHNTON, PA 19540 AND  
THAT CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN NUMBER  
\*\*\*\*\*1125**

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a secured creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Andrew Spivack  
Brock and Scott, PLLC  
Attorneys at Law  
302 Fellowship Road, Suite 130  
Mount Laurel, NJ 08054  
PABKR@brockandscott.com

Freedom Mortgage  
10500 Kincaid Drive  
Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

21-05456 BKMFR01



Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

/s/ Andrew Spivack

Andrew Spivack  
Attorney at Law (84439)  
Brock & Scott, PLLC  
302 Fellowship Road, Suite 130  
Mount Laurel, NJ 08054  
844-856-6646 x3017  
704-369-0760  
PABKR@brockandscott.com

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice of Appearance has been electronically served or mailed, postage prepaid on July 12, 2021 to the following:

MELVIN TORRES  
63 West Madison Street  
Mohnton, PA 19540

David S. Gellert PC  
3506 PERKIOMEN AVE  
READING, PA 19606

Scott F. Waterman, Bankruptcy Trustee  
Chapter 13 Trustee  
2901 St. Lawrence Ave, Suite 100  
Reading, PA 19606

/s/ Andrew Spivack  
Andrew Spivack  
Attorney at Law (84439)  
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